



**Hank Halter**  
Chief Executive Officer

August 28, 2017

To: [boardcomments@ncua.gov](mailto:boardcomments@ncua.gov)

Mr. Gerard Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428

Re: Comments on Closing the Temporary Corporate Credit Union Stabilization Fund and Setting the Share Insurance Fund Normal Operating Level

Dear Board Secretary,

I am writing on behalf of Delta Community Credit Union (Delta Community). We have over 362,000 members and \$5.4 billion in assets. I appreciate the opportunity to provide comments to the National Credit Union Administration (NCUA) on its notice to close the Temporary Corporate Credit Union Stabilization Fund (Stabilization Fund), and to set the Normal Operating Level (NOL) of the National Credit Union Share Insurance Fund (NCUSIF).

Since 2009, Delta Community paid over \$18 million in Stabilization Fund assessments, on top of over \$15 million in losses to Delta Community related to depleted corporate credit union capital. Even at our current asset size, the combined total represents a 60 basis point reduction in our net worth ratio. This reduction for Delta Community (and the credit union industry as a whole) has prevented additional investments in products, services and convenience that would benefit our members and the communities we serve.

We agree that the NCUA's proposal to close the Stabilization Fund by merging it into the NCUSIF is appropriate and necessary. That being said, Delta Community believes that the increase to the NOL is unnecessary and diverts millions of dollars that should be returned to credit unions and their members. We request that NCUA consider setting the NOL at 1.34% on an interim basis, followed by a return to 1.30% for the NOL after the NCUA Guaranteed Notes program ends in 2021. Additionally, while it may be the intent of the current NCUA board to eventually return the NOL to 1.30% from the proposed level of 1.39%, there is no assurance that future board members will honor that intent, and leaving the NOL at 1.39% will again impede credit unions from investing for the benefit of their members.

Thank you for the opportunity to comment. Please let me know if you have any questions or comments regarding this letter, or need additional information to clarify Delta Community Credit Union's perspective.

Sincerely,

A handwritten signature in blue ink, appearing to read "Hank Halter", is written over a faint, larger version of the same signature.

3250 Riverwood Parkway, Atlanta, Georgia 30339